

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

***IN RE: ALLERGAN BIOCELL  
TEXTURED BREAST IMPLANT  
PRODUCT LIABILITY  
LITIGATION***

**THIS DOCUMENT RELATES TO:  
  
ALL CASES**

**Case No. 2:19-md-02921(BRM)(LDW)  
MDL No. 2921**

**JUDGE BRIAN A. MARTINOTTI**

**MAGISTRATE JUDGE LEDA DUNN  
WETTRE**

**DECLARATION OF JASON WOLF ON BEHALF OF  
WOLF GLOBAL COMPLIANCE, LLC**

I, Jason Wolf, hereby declare under penalty of perjury pursuant to 28 U.S.C.  
§ 1746 that the following is true and correct:

1. I have personal knowledge of the matters stated in this Declaration.
2. I am the founder of Wolf Global Compliance, LLC (“WGC”). For over 20 years, I have pioneered and advanced healthcare compliance in personal injury mass tort litigations. My curriculum vitae is attached hereto as “Exhibit A.”
3. WGC has subject matter expertise in advising on settlement administration and implementing litigation solutions, specializing in healthcare lien compliance and resolution. WGC’s Healthcare Compliance and Administration

experience include serving in many high-profile exposure, pharmaceutical, and medical device matters including *World Trade Center*, *Deepwater Horizon*, *Fire Victim Trust*, *NFL Concussion*, *NCAA*, *Guidant*, *Medtronic*, *Transvaginal Mesh*, and *Respironics Personal Injury*, *Respironics Economic Payer*, and *Respironics Medical Advancement Program*.

4. WGC has designed and operationalized the most complex healthcare lien compliance solutions utilized in the physical injury mass tort settlement industry. WGC maintains excellent relationships with healthcare plans and recovery agencies for purposes of engaging and coordinating with them to ensure favorable results for all stakeholders in a settlement program through a fair, accurate, and predictable approach, with special emphasis on securing equitable outcomes for Settling Claimants. Additionally, WGC has significant experience identifying and resolving healthcare liens in cancer-based settlement programs.

5. I have been appointed, as the representative of organizations I have led, by numerous parties and federal and state courts to serve as a Claims Administrator, Lien Resolution Administrator or Healthcare Compliance Neutral to provide settlement services in a broad variety of national mass tort and class action matters, including several multidistrict litigations (“MDLs”).

6. Below is a representative list of matters for which I have led the program design and administration:

- *In re: World Trade Center Disaster Site Litigation*, MDL Docket Nos. MC100, 102-03 (S.D.N.Y.), where I led the design and execution of the Healthcare Compliance obligations associated with claims asserted against the World Trade Center Captive Insurance Company, Inc. relating to the September 11 Consolidated Cases.
- *Deepwater Horizon Litigation*, MDL 2179 (E.D. La.), where I designed and implemented the Medical Benefits Settlement as Claims Administrator and acted as Lien Resolution Administrator, involving identification and resolution of a wide variety of exposure-related injuries and implementation of 21-year periodic medical evaluation program that involved over 22,000 eligible class members.
- *Vioxx Product Liability Litigation*, MDL Docket No. 1657 (E.D. La.), where I served as the Lien Resolution Administrator tasked with resolving health care reimbursement claims (or “liens”) asserted against over 10,000 claimants by Centers for Medicare & Medicaid Services (“CMS”), all 53 state and territory Medicaid agencies; and several other governmental healthcare

payers, such as the Veterans Affairs, TRICARE, and Indian Health Services.

- *In re: Philips Recalled CPAP*, MDL No. 3014 (W.D. Pa), where I am currently serving as the Lien Administrator responsible for identification and resolution of healthcare lien obligations asserted by all federal and state healthcare agencies, as well as most private health insurers, against personal injury settlements for over 33,000 qualifying claimants.
- *National Football League Players' Concussion Injury Litigation*, MDL 2323 (E.D. Pa.), where I designed and implemented a lien resolution and medical evaluation program, comprised of a national network of medical service providers who provided baseline assessments of neurocognitive function and follow-up care, for an estimated 17,000 former players over 10+ years.

7. If a settlement is consummated by the parties to resolve personal injury claims in the above-captioned litigation, WGC is experienced, qualified, and ready to serve as the Lien Administrator responsible for identification, negotiation, and resolution of healthcare liens against settling claimants.

Dated: December 22, 2025



Jason Wolf, on behalf of WGC

## **EXHIBIT A**

### **Jason Wolf Healthcare Compliance Expert**

**Contact:**

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Email: [jason@wolfglobalcompliance.com](mailto:jason@wolfglobalcompliance.com)

Address: 229 S. Brevard, Suite 300, Charlotte, NC 28202

## **SUMMARY**

Jason Wolf is a distinguished professional renowned for resolving complex administrative challenges within numerous high-profile settlement programs involving physical harm and emotional distress. With extensive experience in healthcare compliance, he has built strong partnerships with federal (Medicare, Veterans Affairs, TRICARE, and Indian Health Services) and state healthcare agencies, private healthcare plans, and third-party recovery contractors, facilitating fair and efficient agreements in numerous aggregate settlements. His expertise extends to operational design and management, particularly in pioneering global lien resolution and medical monitoring within mass tort settlements.

## **PROFESSIONAL EXPERIENCE**

### **Wolf Global Compliance, LLC (“WGC”)**

Founder & CEO | January 2024 - Present

Founded WGC to provide specialized healthcare compliance services to the mass tort litigation and settlement community, elevating industry standards in healthcare compliance through systematic identification and resolution of healthcare liens. WGC leverages its unmatched policy expertise to drive optimal solutions and outcomes for all stakeholders, effectively mitigating liabilities for plaintiffs, plaintiff’s counsel, and defense. Committed to elevating standards and driving technological innovation, WGC has set the benchmark for the healthcare compliance industry.

### **Wolf/Garretson, LLC (“W/G”)**

Healthcare Compliance Consultant | January 2022 – January 2024

Provided design and administrative oversight services in healthcare compliance for the mass tort industry.

### **The Garretson Resolution Group, Inc (“GRG”)**

Co-Founder & President | January 2003 – December 2018

Co-founded GRG, a leading provider of comprehensive settlement administration services in mass tort settlements. Guided the company through two successful private equity transactions before its acquisition by Epiq in 2019.

### **Signal Interactive**

Co-Founder |

Co-founded Signal Interactive Media, dedicated to enhancing class notice efficacy through contemporary data analytics and mass media.

### **Legal and Healthcare Conferences**

Regular speaker at legal and healthcare conferences, sharing insights and expertise with industry professionals.

## **PROGRAMMATIC EXPERIENCE**

### ***Leadership Role in Administrative Design & Execution***

**World Trade Center Disaster Site Litigation** | MDL Docket MC100, MC102 and MC103 | United States District Court, Southern District of New York | Judge Alvin K. Hellerstein

**3M Combat Arms Earplug Products Liability Litigation** | MDL 2885 | United States District Court, Northern District of Florida | Judge M. Casey Rodgers

**Deepwater Horizon Litigation** | MDL 2179 | United States District Court, Eastern District Louisiana | Judge Carl A. Barbier

**National Football League Players' Concussion Injury Litigation** | MDL 2323 | United States District Court, Eastern District of Pennsylvania | Judge James A. Byrne

**Zyprexa Products Liability Litigation** | MDL 1596 | United States District Court, Eastern District of New York | Judge Jack B. Weinstein

**Actos Products Liability Litigation** | MDL 2299 | United States District Court, Western District of Louisiana | Judge Terry A. Doughty

**Vioxx Products Liability Litigation** | MDL 1657 | United States District Court, Eastern District of Louisiana | Judge Eldon E. Fallon

**Fire Victim Trust** | U.S. Bankruptcy Court for the Northern District of California | Judge Dennis Montali | Trustee, Cathy Yanni

## **EDUCATION**

**Graduate Degree** | Master of Arts and Sciences | Communication Eastern Michigan University

**Undergraduate Degree** | Bachelor of Science | Communication Eastern Michigan University

**PERSONAL**

**Brooklyn Collective CLT** | January 2020 - Present

Founder & Board Member

Founded and sits on the board of the Brooklyn Collective CLT, a nonprofit promoting inclusivity and upward mobility in the Charlotte region.

**NXT CLT** | January 2021 – December 2022 Board Member

Served on the board of NXT CLT, a nonprofit supporting businesses owned by people of color.

**Gratitude @ Work** | Board Member

Board member of Gratitude @ Work, a nonprofit dedicated to empowering individuals who have experienced physical or emotional trauma.